

REMARKS/ARGUMENTS

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the amendments and remarks herewith. The present amendment is being made to facilitate prosecution of the application.

I. STATUS OF THE CLAIMS AND FORMAL MATTERS

Claims 1, 3-26, and 28-54 are pending. Claims 1, 26, and 51-54, which are independent, are hereby amended. Support for this Amendment is provided through the Specification as originally filed, and specifically at pages 64-74 and Figures 70-82.

No new matter has been introduced by this amendment. Changes to the claims were not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112. Rather, these changes were made simply for clarification and to round out the scope of protection to which Applicants are entitled.

II. REJECTIONS UNDER 35 U.S.C. §103(a)

Claims 1, 3-5, 7, 9-16, 18, 20, 22-26, 28-30, 32, 34-41, 43, 45, 47-50, and 51-54 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,356,903 (hereinafter "Baxter") in view of U.S. Patent No. 5,742,816 (hereinafter "Barr").

Claims 6, 8, 31, and 33 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Baxter in view of Barr and further in view of U.S. Patent No. 6,421,675 (hereinafter "Ryan").

Claims 17, 19, 21, 42, 44, and 46 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Baxter in view of Barr and further in view of U.S. Patent No. 6,023,714 (hereinafter "Hill").

As understood by Applicants, Baxter relates to a content management system for information delivery systems, including web-based systems, that organizes the content of the information separately from the appearance of the presented information.

As understood by Applicants, Barr relates to a method and apparatus for identifying textual documents and multimedia files corresponding to a search topic.

As understood by Applicants, Ryan relates to a method of updating an internet search engine database with the results of a user's selection of specific web page listings from the general web page listing provided to the user as a result of his initial keyword search entry.

As understood by Applicants, Hill relates to dynamically adapting the layout of a document to a particular output device.

Applicants respectfully submit that the present claims are patentable over the cited references for at least the following reasons.

A. Cited references fail to meet all claim limitations

Claim 1 recites, *inter alia*:

"... an external interface generator for generating an interface to an external component, the external component being an external server-hosted application developed by a third party that generates custom content for inclusion in the web site; ..."
(Emphasis added)

Applicants respectfully submit that nothing has been found in Baxter, Barr, Ryan, or Hill, taken alone or in combination, that would teach or suggest the above-identified feature of claim 1. Specifically, neither Baxter, Barr, Ryan, nor Hill, taken alone or in combination, teach

or suggest an external interface generator for generating an interface to an external component, the external component being an external server-hosted application developed by a third party that generates custom content for inclusion in the web site, as recited in claim 1.

B. Office Action has failed to establish a *prima facie* case for obviousness

None of the cited references, either alone or in combination, teach, suggest or motivate a skilled artisan to develop or practice the instant invention. To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation to modify the reference or to combine reference teachings either in the references themselves or in the general knowledge available to one of ordinary skill in the art; second, there must be a reasonable expectation of success; third, the prior art reference or references must teach or suggest all the claim limitations. MPEP § 2143. It is, however, impermissible for the Office Action to use hindsight based on an Applicants' disclosure to determine that an Applicants' claimed invention is obvious in view of the cited art. MPEP § 2142. The motivation or teaching to make the claimed combination by modifying or combining prior art references must be found in the prior art and not in the Applicants' own disclosure. *In re Vaeck*, 20 U.S.P.Q.2d 1438 (Fed. Cir. 1991).

The Office Action has ignored two important elements of substantiating a rejection under 35 U.S.C. § 103(a), namely (1) "to provide some suggestion of the desirability of doing what the inventor has done," and (2) demonstrating that "there must be a reasonable expectation of success." MPEP § 706.02(j) (emphasis added). Because of these deficiencies in the rejection, Applicants respectfully request the withdrawal of the §103 rejections.

Accordingly, because two of the “basic criteria” of obviousness have not been, and cannot be established, the Office Action has failed to present a *prima facie* case of obviousness.

Therefore, for at least these reasons, independent claim 1 is patentable.

Independent claims 26, and 51-54 are similar, or somewhat similar, in scope and are therefore patentable for similar, or somewhat similar, reasons.

III. DEPENDENT CLAIMS

The other claims in this application are each dependent from one of the independent claims discussed above and are therefore patentable for at least the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

CONCLUSION

In the event the Examiner disagrees with any of statements appearing above with respect to the disclosure in the cited references, it is respectfully requested that the Examiner specifically indicate those portions of the references providing the basis for a contrary view.

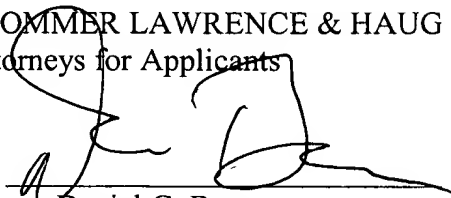
Please charge any additional fees that may be needed, and credit any overpayment, to our Deposit Account No. 50-0320.

Applicants respectfully submit that all of the claims are in condition for allowance
and request early passage to issue of the present application.

Respectfully submitted,

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By

A handwritten signature in black ink, appearing to read 'Daniel G. Brown', is written over a horizontal line.

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